

D. Craig Parry (7274)  
Chaunceton Bird (16402)  
Daniel J. Nelson (19030)  
**PARR BROWN GEE & LOVELESS, P.C.**  
101 South 200 East, Suite 700  
Salt Lake City, Utah 84111  
Telephone: (801) 532-7840  
Facsimile: (801) 532-7750  
*cparry@parrbrown.com*  
*cbird@parrbrown.com*  
*djnelson@parrbrown.com*

Mark O. Van Wagoner (3313)  
2455 E. Parleys Way, Suite 200  
Salt Lake City, Utah 84109  
Telephone: 801-328-2200  
*movw@comcast.net*

*Attorneys for Defendants*

---

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

---

ZACHARY SZYMAKOWSKI, an individual,  
and JOHANNA A. URIBE, on behalf of FELIPE  
A. URIBE, a minor, on behalf of themselves and  
a proposed class of allegedly similarly situated F-  
1 students,

Plaintiffs,

vs.

UTAH HIGH SCHOOL ACTIVITIES  
ASSOCIATION, INC., a Utah nonprofit  
corporation; ROBERT CUFF, an individual;  
MARILYN RICHARDS, an individual; AMBER  
SHILL, an individual; BURKE STAHELI, an  
individual; DAVID WARREN, an individual;  
DAVID LUND, an individual; ZACK MCKEE,  
an individual; PAUL SWEAT, an individual;  
LUKE RASMUSSEN, an individual; JERRE  
HOLMES, an individual; JASON SMITH, an  
individual; MIKE MEES, an individual; DEVIN  
SMITH, an individual; BRYAN DURST, an  
individual; and BRENT STRATE, an individual,

Defendants.


**STIPULATED MOTION TO EXTEND  
TIME FOR DEFENDANTS TO FILE  
REPLY SUPPORTING MOTION TO  
DISMISS**

Case No.: 2:24-cv-00751  
Judge Robert J. Shelby  
Magistrate Judge Cecilia M. Romero

Defendants Utah High School Activities Association, Inc. (“UHSAA”), Robert Cuff, Marilyn Richards, Amber Shill, Burke Staheli, David Warren, David Lund, Zack Mckee, Paul Sweat, Luke Rasmussen, Jerre Holmes, Jason Smith, Mike Mees, Devin Smith, Bryan Durst, and Brent Strate (collectively, “Defendants”) and Plaintiffs Zachary Szymakowski and Johanna Uribe (on behalf of Felipe Uribe) (collectively, “Plaintiffs”) stipulate to extend the deadline for Defendants to file their Reply Memorandum Supporting Motion to Dismiss (“Reply”) (replying in support of their Motion to Dismiss Individual Defendants ([ECF No. 102](#)) and responding to arguments raised in Plaintiffs’ Opposition to Motion to Dismiss Individual Defendants ([ECF No. 115](#))). Defendants and Plaintiffs jointly move the Court for entry of an order extending the deadline for Defendants to file their Reply from January 6, 2025, to January 13, 2025. A proposed order granting such relief is submitted herewith.

Good cause exists for granting the stipulated requested extension. The time for drafting the Reply falls squarely over major holidays, and attorneys and client contacts that would be instrumental in preparing the Reply are out of town or otherwise unavailable to dedicate time to the Reply until early January. The time to file the Reply has not yet expired.

DATED: December 30, 2024



---

**PARR BROWN GEE & LOVELESS**

D. Craig Parry  
Chaunceton Bird  
Daniel J. Nelson

Mark O. Van Wagoner

*Attorneys for Defendants*

DATED: December 30, 2024

*Tanner B. Camp\**

---

**FOLEY & LARDNER**

David J. Jordan

Wesley F. Harward

Tanner B. Camp

Tyler A. Dever

Charles D. Morris

*Attorneys for Plaintiffs*

\*Electronically signed by proxy by  
Chaunceton Bird per emailed permission from  
Tanner Camp.